

## POSTAL RATE COMMISSION

In the Matter of:                    )  
  )  
RATE AND SERVICE CHANGES        )  
TO IMPLEMENT FUNCTIONALLY        ) Docket No. MC2004-4  
EQUIVALENT NEGOTIATED            )  
SERVICE AGREEMENT WITH          )  
DISCOVER FINANCIAL                )  
SERVICES                            )

Room 300  
Postal Rate Commission  
1333 H Street, N.W.  
Washington, D.C.

Volume 1  
Thursday, July 15, 2004

The above-entitled matter came on for hearing  
pursuant to notice, at 11:02 a.m.

## BEFORE:

HON. GEORGE A. OMAS, CHAIRMAN  
HON. TONY A. HAMMOND, VICE CHAIRMAN  
HON. RUTH Y. GOLDWAY, COMMISSIONER  
HON. DANA B. COVINGTON, COMMISSIONER

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(No Appearance.)

On behalf of National Newspaper Association:

(No Appearance.)

On behalf of Newspaper Association of America:

(No Appearance.)

On behalf of David D. Popkin:

(No Appearance.)

P R O C E E D I N G S

(11:02 a.m.)

CHAIRMAN OMAS: Good morning. Today we have scheduled prehearing conferences in two cases. Both cases involve requests to implement negotiated service agreements that are offered as functionally equivalent to the negotiated service agreement between the Postal Service and Capital One Services, Inc. that this Commission approved slightly more than a year ago.

At this time, we will discuss issues involved in consideration of Docket No. MC2004-4. The Postal Service and Discovery Financial Services, Inc. are joint proponents of the negotiated service agreement that forms the basis for this case.

I am George Omas, Chairman of the Commission. I will serve as presiding officer of this case. With me this morning is Vice Chairman Tony Hammond, Commissioner Dana Covington and Commissioner Ruth Goldway.

The Postal Service and Discover have proposed that they be authorized to establish unique reciprocal rate and fee provisions. In general, under this agreement the Postal Service at certain levels of volume would provide Discover electronic address correction without fee for solicitations sent by first

1 class mail that are undeliverable as addressed and  
2 cannot be forwarded under existing regulation.

3 If the foregoing conditions are met,  
4 Discover would be eligible for per piece discounts on  
5 those portions of its first class mail volume that  
6 exceeds specified volume thresholds.

7 This is the first that subpart (L) of the  
8 Commission's Rules of Practice and Procedures are  
9 being applied. Hopefully these new rules will  
10 facilitate the review of proposed negotiated service  
11 agreements.

12 In any event, the Commission will be  
13 understanding of participants' efforts to become  
14 familiar with these rules and will allow some leeway  
15 if it appears that participants need time to adjust to  
16 new standards or requirements.

17 In line with this, yesterday I issued a  
18 presiding officer's information request. Some of the  
19 information I have asked for should perhaps have been  
20 incorporated with the initial request. However, I  
21 view its absence as a result of this need to address  
22 new filing requirements.

23 Finally, the Commission would like  
24 participants to feel free to comment at the conclusion  
25 of this proceeding on how these rules have operated

1 and how they might be improved in the future.

2 The reporter in this case is Heritage  
3 Reporting Corporation. There are forms for noting  
4 appearance available on the table as you enter the  
5 hearing room. If you wish to purchase transcripts,  
6 you should see the reporter after today's conference  
7 or call (202) 628-4888.

8 At this point, I would like to ask counsel  
9 to identify themselves for the record. United States  
10 Postal Service?

11 MR. REIMER: Brian Reimer for the United  
12 States Postal Service, and with me at the table is Nan  
13 McKenzie.

14 CHAIRMAN OMAS: Discover Financial Services,  
15 Inc.

16 MR. BRINKMANN: Bob Brinkmann for Discover.

17 CHAIRMAN OMAS: Alliance of Nonprofit  
18 Mailers?

19 MR. LEVY: David Levy, and with me is Joy  
20 Leong.

21 CHAIRMAN OMAS: American Bankers  
22 Association?

23 MR. WARDEN: Irving Warden for the American  
24 Bankers Association.

25 CHAIRMAN OMAS: Thank you.

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1 American Postal Workers Union, AFL-CIO?

2 MR. TABBITA: Phillip Tabbita for the  
3 American Postal Workers Union.

4 CHAIRMAN OMAS: J.P. Morgan Chase & Company?

5 MR. LEVY: David Levy and Joy Leong.

6 CHAIRMAN OMAS: Magazine Publishers of  
7 America?

8 MR. MYERS: Pierce Myers.

9 CHAIRMAN OMAS: National Association of  
10 Postmasters of the United States?

11 (No response.)

12 CHAIRMAN OMAS: National Newspaper  
13 Association?

14 (No response.)

15 CHAIRMAN OMAS: Newspaper Association of  
16 America?

17 (No response.)

18 CHAIRMAN OMAS: Newspaper Association of  
19 America?

20 (No response.)

21 CHAIRMAN OMAS: Office of the Consumer  
22 Advocate?

23 MR. COSTICH: Thank you, Mr. Chairman. Rand  
24 Costich for the OCA, and with me is Shelley Dreifuss,  
25 Director of the office.

1 CHAIRMAN OMAS: David D. Popkin.

2 (No response.)

3 CHAIRMAN OMAS: Val-Pak Dealers Association,  
4 Inc.?

5 MR. OLSON: Mr. Chairman, William Olson  
6 representing Val-Pak Dealers Association and Val-Pak  
7 Direct.

8 CHAIRMAN OMAS: Marketing Systems, Inc.  
9 Thank you.

10 The intervention of the National Association  
11 of Postmasters of the United States was received one  
12 day late. That intervention is accepted.

13 The National Newspaper Association filed a  
14 motion for acceptance of late intervention. That  
15 motion is granted.

16 Is there anyone else here I have missed?

17 (No response.)

18 CHAIRMAN OMAS: Along with its request in  
19 this case, the Postal Service asked that settlement  
20 procedures be established, and Commission Order No.  
21 1409 appointed Postal Service counsel to serve as  
22 settlement coordinator.

23 Mr. Reimer, would you please report on the  
24 progress of this settlement?

25 MR. REIMER: Thank you, Mr. Chairman. The



1     Postal Service presided at a settlement conference  
2     yesterday at which the Postal Service and Discover,  
3     the co-proponents of the agreement, were present, as  
4     were the Office of the Consumer Advocate and  
5     Intervenors J.P. Morgan, APWU, Val-Pak, ABA and the  
6     Alliance of Nonprofit Mailers.

7             The discussion concentrated on the core  
8     procedural issues that arise in this case. Number  
9     one, functional equivalency and the appropriateness of  
10    proceeding under Rule 196 of the Commission's Rules of  
11    Practice; No. 2, the Postal Service's proposal for  
12    limitation of issues; No. 3, the need for a hearing in  
13    this case; and, No. 4, the timing for discovery. We  
14    made progress on a number of these issues, which we  
15    hope will expedite this case.

16            Turning to the first issue, functional  
17    equivalency, none of the participants at the  
18    conference yesterday stated that they opposed this  
19    case being treated as functionally equivalent to  
20    Capital One, although one party indicated it had not  
21    as of yesterday made a decision on this issue.

22            As this is the first proceeding which the  
23    proponents are proffering an NSA as functionally  
24    equivalent to a baseline, there was some discussion  
25    about what the effect of such a ruling would be.

1           The participants agreed that our  
2 understanding is that there still would be an  
3 opportunity to conduct discovery, have evidence  
4 introduced into the record and fully brief the issues  
5 that will be decided in this case.

6           The Postal Service submits that this NSA is  
7 functionally equivalent to the Capital One NSA and  
8 requests the Commission to make a determination on  
9 that issue promptly, and we are ready to address that  
10 issue today if need be.

11           The second issue concerning the Postal  
12 Service's proposal for limitation of issues. We  
13 discussed that proposal, which was filed pursuant to  
14 Rule 196(a)(6). It seeks to limit litigation of the  
15 issues of the financial impact of the Discover NSA on  
16 the Postal Service, as well as the fairness and equity  
17 of the NSA in regard to other users of the mail and  
18 the fairness and equity of the NSA in regard to  
19 competitors of Discover.

20           One of the parties present yesterday  
21 expressed concern that the proposal might limit  
22 litigation of the issue about whether there should be  
23 a cap in the case or the nature of the cap, and the  
24 participants all agreed that that would not be limited  
25 as it has to do with the financial effects of the NSA.

1           The same party indicated it might oppose all  
2   or part of this motion. The Postal Service submits  
3   that the motion should be granted, and it is prepared  
4   today to address its proposal for limitation of issue.

5           The third point, the need for a hearing.  
6   While no party has requested a hearing at this point,  
7   two of the participants yesterday indicated that they  
8   might need additional time to decide whether they  
9   wished to request a hearing.

10           We decided to request that the Commission  
11   give the parties a week to further explore this issue,  
12   and the Postal Service would like to report back to  
13   the Commission a week from today on whether the  
14   participants have reached an agreement on the need for  
15   hearing, and that could be part of our first report as  
16   settlement coordinator a week from today.

17           Finally the fourth issue, discovery. The  
18   participants agreed to a cutoff date of August 5 for  
19   the parties to propound discovery on the Postal  
20   Service and Discover witnesses. The Postal Service  
21   and Discover have also agreed that they would be  
22   willing to abide by a timeframe whereby objections are  
23   due within seven days and answers are then due at 10  
24   days.

25           That is our report, Mr. Chairman.

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1 CHAIRMAN OMAS: Thank you.

2 Does any participant here wish to supplement  
3 that statement?

4 (No response.)

5 CHAIRMAN OMAS: Order No. 1410 indicated  
6 that certain topics would be discussed at this  
7 conference. Although the Postal Service touched on  
8 some of these issues in its settlement report, I  
9 wanted to make sure that the record is clear that the  
10 Commission has the input of all interested  
11 participants with regard to each of these topics.

12 The first item for discussion is whether or  
13 not it is appropriate to consider this case under Rule  
14 196. That rule is intended to facilitate requests for  
15 negotiated service agreement that are functionally  
16 equivalent to existing negotiated service agreements.  
17 Functionally equivalent does not mean identical. It  
18 does mean similar in important respects, a definition  
19 that allows some interpretation.

20 The Commission will examine relevant factors  
21 and issue a ruling shortly on whether it is  
22 appropriate to proceed under that rule.

23 Is there any participant that believes that  
24 the negotiated service agreement between the Postal  
25 Service and Discover is not functionally equivalent to

1 the negotiated service agreement between the Postal  
2 Service and Capital One?

3 Mr. Olson?

4 MR. OLSON: Mr. Chairman, just to have this  
5 record be somewhat similar to the other record, I'd  
6 just like to say that for Val-Pak's purposes we do not  
7 object to the case being treated as a functionally  
8 equivalent NSA so long as we do have the procedural  
9 due process rights that the parties agreed mailers  
10 would have and Intervenor would have as previously  
11 explained by Postal Service counsel a few moments ago.

12 CHAIRMAN OMAS: Thank you.

13 The Postal Service also accompanied its  
14 request with a proposal for limitation of issues. Are  
15 participants prepared to discuss that proposal for  
16 limitation of issues at this time?

17 MR. REIMER: The Postal Service is prepared  
18 to discuss that.

19 CHAIRMAN OMAS: Thank you, Mr. Reimer.

20 MR. BRINKMANN: Yes, Discover is prepared to  
21 discuss that.

22 CHAIRMAN OMAS: Thank you.

23 Mr. Reimer? I'll get your name correct  
24 sooner or later.

25 MR. REIMER: Thank you, Mr. Chairman. In

1 the Postal Service's proposal for limitation of  
2 issues, we acknowledge the fact, as the Commission has  
3 stated in its rules, that the financial impact of a  
4 functionally equivalent NSA over the duration of the  
5 agreement are in play, and, as I mentioned in the  
6 settlement report, we agree that the issues concerning  
7 the cap and how the cap is calculated are encompassed.  
8 That is the parties' understanding under that.

9 Just as well, the fairness and equity of the  
10 NSA in regard to other users of the mail and the  
11 fairness and equity of the NSA in regard to  
12 competitors of the parties of course are in issue.

13 What the Postal Service also did in its  
14 motion is we selected five issues from the Capital One  
15 NSA litigation that in our opinion had been decided  
16 and in our opinion would not appropriately be  
17 relitigated in a proceeding for a functionally  
18 equivalent NSA, the first one being the predominantly  
19 legal issue of whether NSAs are consistent with the  
20 Postal Reorganization Act.

21 The second one being the finding that an  
22 open niche classification should not be preferred over  
23 an NSA in the general sense. As to that issue, of  
24 course in a baseline proceeding the issue of whether  
25 something would be better suited to be a niche is an

1 open issue, but once there has been an approved  
2 negotiated service agreement and once the parties have  
3 negotiated a functionally equivalent NSA in reliance  
4 on the Commission's rules and regulations, we don't  
5 believe that that is an issue for this type of a  
6 proceeding.

7 Third, the finding that provisions of  
8 incentives to high cost mailers to discontinue high  
9 cost behavior should not in an abstract sense  
10 disqualify a proposed NSA.

11 Fourth, the general appropriateness of  
12 combining so-called independently usable unrelated  
13 requirements and, fifth, the utility of declining  
14 block rates.

15 As a sixth matter, we also pointed out the  
16 appropriateness of the relationship between the core  
17 elements of the NSA, including the finding that the  
18 net cost and revenue effect of the elements could  
19 benefit the Postal Service.

20 These are general issues that we believe  
21 were decided in the Capital One case. Of course,  
22 issues that are specific to these NSAs, we don't  
23 believe that our motion seeks to preclude any of  
24 these. We ask that the Commission, with that in mind,  
25 grant our proposal.

1 CHAIRMAN OMAS: Thank you, Mr. Reimer.

2 Mr. Brinkmann?

3 MR. BRINKMANN: Mr. Chairman, just a few  
4 comments. First, I'd like to express our appreciation  
5 with the Chairman's and the Commission's emphasis on  
6 expedition. If indeed the negotiated service  
7 agreement area is going to work, expedited treatment  
8 of the functionally equivalent NSAs is going to be  
9 very important.

10 I think all of the parties in this as we go  
11 through this should keep in mind that that means  
12 trying to minimize transaction costs not only in this  
13 one, but in the future, so other interested parties,  
14 be they banks or people in other industries, don't  
15 have an image that this is an extremely expensive,  
16 extremely complicated and extremely long proceeding  
17 and, therefore, that they don't want to get involved  
18 in that.

19 With that in mind, from the perspective of  
20 somebody who has negotiated one of these things, I  
21 think two comments are important. In terms of  
22 functional equivalency, while there is no debate I  
23 think about whether this is a functionally equivalent  
24 one, I think the Commission and the Postal Service do  
25 want to ensure that when other people come in to



1 negotiate NSAs with the Postal Service and they see  
2 DMM language that outlines what the baseline NSA is  
3 and they see DMCS language that outlines what the  
4 baseline NSA is, if they negotiate an agreement that  
5 squarely falls within those parameters it should not  
6 be a difficult question as to whether it's a  
7 functionally equivalent NSA.

8           It seems to me that precision in that  
9 decision should be something the Commission should  
10 encourage in the procedure of parties that negotiate  
11 NSAs. Now, if they negotiate one that is on the  
12 fringes that's an issue to be dealt with.

13           Finally, I think a final point, and that's  
14 the area of niche classifications. I represent a  
15 client who has spent a considerable amount of time,  
16 almost two years, negotiating an agreement with the  
17 Postal Service in reasonable reliance on the language  
18 of the Commission in the Capital One case and  
19 reasonable reliance on the language of the Commission  
20 in Order 1391 and the creation of functionally  
21 equivalent, rules for functionally equivalent NSAs.

22           It strikes me to even consider the idea that  
23 somehow this negotiated agreement should be thrown out  
24 at some point and a niche be substituted is not  
25 reasonable. That's not to say that there might not be

1 an opportunity sometime in the future for a spinoff  
2 niche or some other sort of niche, but the rules  
3 clearly contemplate competitors of a baseline  
4 contractee negotiating a functionally equivalent NSA,  
5 and we believe that that's what we've done.

6 We think that the issue of a niche  
7 classification should be in place of our functionally  
8 equivalent agreement and should be precluded from  
9 litigation.

10 Thank you.

11 CHAIRMAN OMAS: Thank you, Mr. Brinkmann.

12 Mr. Olson?

13 MR. OLSON: Thank you, Mr. Chairman. I do  
14 want to just address this issue of the Postal  
15 Service's proposal for limitation of issues, which  
16 basically identifies the six issues Mr. Reimer  
17 mentioned as having been precluded and then proposes  
18 that the only issues on the table are I believe  
19 identical to what is in Rule 196. No other issues,  
20 just the minimal issues that the Commission  
21 established in Rule 196, is always up for grabs in a  
22 functionally equivalent NSA.

23 I would like to take just one to comment on  
24 at the moment since both counsel just discussed this.  
25 It has to do with the issue of the niche

1 classification.

2           The representation that's been made by the  
3 Postal Service to the Commission -- or really not the  
4 representation, but the proposal says that the  
5 findings in an open niche classification should not be  
6 preferred over an NSA in general, that that was  
7 decided in MC2002-2 and should not be relitigated. To  
8 repeat that, the finding that an open niche  
9 classification should not be preferred over an NSA in  
10 general.

11           We actually think that's the reverse of what  
12 the Commission said in MC2002-2. At paragraph 3039 of  
13 its opinion there is the following language:  
14 "However, the Commission's predisposition to prefer  
15 more inclusive mail classifications..." -- niches  
16 rather than NSAs -- "...is not a sufficient basis for  
17 canonizing GCA's proposed requirement..." et cetera,  
18 et cetera.

19           In other words, we think that the Commission  
20 has clearly said that niches are preferable, more  
21 general opportunities are more preferable, and at  
22 paragraph 3040 said: "Nevertheless, the Commission  
23 will continue to allow participants to inquire into  
24 the feasibility of more inclusive classification  
25 provisions and to propose more expansive alternatives

1 as it has done in this proceeding," and that's the  
2 language on which we would rely.

3 I would also note that there's a footnote  
4 dropped from the Commission's opinion at that point  
5 saying that the record in that docket indicated the  
6 Postal Service did not have the operational capability  
7 to implement the terms of the NSA with Cap One on a  
8 system-wide basis as a niche classification at this  
9 time.

10 I would, for example, say, Mr. Chairman,  
11 that we are going to be propounding discovery seeking  
12 to determine whether from Mr. Plunkett or others that  
13 this has changed. Maybe there is a way to do it at  
14 this time.

15 As anticipated in the Cap One case, we think  
16 this is an issue that is before the Commission and one  
17 that discovery is permissible on. It may be that if  
18 we file an interrogatory an objection will be  
19 forthcoming, and the Commission would have to rule on  
20 that.

21 We do believe that the Cap One case  
22 anticipates these kinds of questions as totally  
23 permissible and appropriate and, frankly, we think  
24 necessary to raise.

25 Lastly, I would say, Mr. Chairman, that we

1 would just ask for the same opportunity you identified  
2 in the earlier Bank One docket for us to submit  
3 something further in writing subsequent to the  
4 hearing. We would just ask for that same opportunity.

5 CHAIRMAN OMAS: We will allow that. Thank  
6 you.

7 Mr. Costich?

8 MR. COSTICH: Thank you, Mr. Chairman. Just  
9 so the record is clear, it is the OCA's understanding  
10 that issues related to the merger -- there is no  
11 merger in this case. Strike all of that. Thank you.

12 CHAIRMAN OMAS: Thank you, Mr. Costich.

13 MR. REIMER: Mr. Chairman, just to make it  
14 clear to the Commission what the position of the  
15 Postal Service is in case there is any confusion, we  
16 read the Commission's recommended decision in the Cap  
17 One case as concluding that the niche issue can be  
18 raised in a baseline NSA case, but it is our position  
19 in this case that it is inappropriate to do so because  
20 this is a functionally equivalent case and the niche  
21 issue was addressed in the baseline case.

22 CHAIRMAN OMAS: Thank you, Mr. Reimer.

23 MS. DREIFUSS: Mr. Chairman, may I just  
24 comment? This is Shelley Dreifuss from the Office of  
25 the Consumer Advocate. Can I just add my comment on

1 the issue of niche classification?

2 It really won't have any impact in this  
3 proceeding. I don't think it is going to go that  
4 route, but I would like to exhort the Postal Service  
5 in advance of future baseline NSAs to think seriously  
6 about coming prepared in future NSAs with not only a  
7 baseline NSA, and perhaps they may be thinking about  
8 functionally equivalent NSAs of the future, but also  
9 come prepared with an alternative classification, a  
10 niche classification that reflects the lessons that  
11 were learned and the knowledge gleaned from its  
12 negotiations with a baseline partner.

13 It's just a policy statement. No need for  
14 you to take any action at this time.

15 CHAIRMAN OMAS: Thank you, Ms. Dreifuss. We  
16 appreciate that.

17 MR. BRINKMANN: Mr. Chairman, along those  
18 lines I think the philosophy and the policy statement  
19 of whether you should have a niche classification or a  
20 specific NSA, Discover shouldn't have to spend tens of  
21 thousands of dollars providing information that's  
22 relative to whether its agreement should be thrown out  
23 and a niche substituted. It's just not fair to the  
24 client.

25 CHAIRMAN OMAS: Thank you, Mr. Brinkmann.

1 Is there anyone else?

2 (No response?)

3 CHAIRMAN OMAS: I want Mr. Olson and others  
4 to submit written comments on the issue of limitation  
5 of issues two weeks from today. Responses are due one  
6 week after that.

7 Mr. Reimer?

8 MR. REIMER: Mr. Chairman, we would like to  
9 request an opportunity to respond to the comments that  
10 might be made.

11 CHAIRMAN OMAS: Absolutely.

12 MR. REIMER: Thank you.

13 CHAIRMAN OMAS: Does any participant know at  
14 this time that they believe evidentiary hearings will  
15 be necessary? Mr. Olson?

16 MR. OLSON: Mr. Chairman, not to be  
17 redundant, but I guess I have to be. We hope that the  
18 responses to discovery are complete and suitable for  
19 introduction of the record and that no hearings would  
20 be necessary, although it is certainly conceivable  
21 that there will be factual issues that may request it.

22 I would frankly ask the Commission again to  
23 defer a decision on a hearing until after the close of  
24 discovery when the parties know what the answers are  
25 and whether they can prove their cases sufficiently to

1       argue it in brief without a hearing.

2               We wouldn't want to request a hearing unless  
3       one was absolutely necessary, but if for some reason  
4       there's a need to make a protective request we would  
5       request a hearing to deal with the issues we've  
6       identified.

7               I hope it doesn't come to that, and I do  
8       expect to get back to counsel for the Postal Service  
9       before his one week report on where we are on the  
10      issue of a hearing with additional information so that  
11      the Commission can be briefed on the movement towards  
12      settlement.

13              CHAIRMAN OMAS:   Thank you.

14              MR. REIMER:   Mr. Chairman?

15              CHAIRMAN OMAS:   Mr. Reimer?

16              MR. REIMER:   It's actually Reimer.   The  
17      Germans always pronounce the second vowel.

18              CHAIRMAN OMAS:   Thank you.

19              MR. REIMER:   It is the Postal Service's  
20      position that as a general rule in these cases  
21      decisions about a hearing should be made earlier than  
22      the close of discovery, but in this particular case we  
23      do hope that we can resolve that issue within the next  
24      week, and we will include what progress we have made  
25      in our first report.



1           CHAIRMAN OMAS: Thank you, Mr. Reimer.

2           Based on earlier progress reports of the  
3 settlement coordinator, I understand that additional  
4 discovery is sought by several Intervenors.

5           Does any participant wish to express an  
6 additional view on how much additional time should be  
7 allowed for discovery directed to co-proponents?

8           (No response.)

9           CHAIRMAN OMAS: Does any participant have  
10 any other matters that we should take up this morning?

11          (No response.)

12          CHAIRMAN OMAS: It is my understanding that  
13 settlement negotiations will be continuing.  
14 Consistent with the progress report on settlement, I  
15 would like a written progress report filed one week  
16 from today. After that, I would like reports on the  
17 progress towards settlement submitted to the  
18 Commission every two weeks.

19          If there is nothing further, this prehearing  
20 conference is adjourned. Thank you.

21          (Whereupon, at 11:30 a.m. the hearing in the  
22 above-entitled matter was concluded.)

23        //

24        //

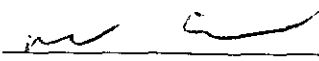
25        //

REPORTER'S CERTIFICATE

DOCKET NO.: MC2004-4  
CASE TITLE: Rate and Service Changes  
Discover Financial Services  
HEARING DATE: July 15, 2004  
LOCATION: Washington, D.C.

I hereby certify that the proceedings and evidence are contained fully and accurately on the tapes and notes reported by me at the hearing in the above case before the Postal Rate Commission.

Date: July 15, 2004

  
\_\_\_\_\_  
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